REMARKS/ARGUMENTS

In the specification, the title has been amended to more closely reflect the teachings of the specification. No new matter has been introduced.

Claims 1, 8 and 15 have been amended. No claims have been canceled. Claims 1-21 represent the set of claims currently pending in this application. Reexamination and reconsideration of the application as amended are respectfully requested.

Claim Amendments

Amendments to the claims, as indicated above, were made solely for the purpose of clarifying the language of the claims, and were not required for patentability or to distinguish the claims over the prior art.

Rejection under 35 USC § 102(e)

The Examiner rejected claims 1-21 as being anticipated by US Patent number 6,189,019 issued to Blumer et al. (hereinafter "Blumer"). Applicant respectfully traverses these rejections for the reasons set forth below.

Claims 1, 8 and 15

The Examiner cited Blumer column 19, lines 15 –38; column 11, lines 34 – 54 and lines 54 - 67; column 15, lines 1 – 24; column 12, lines 1 – 18; column 13, lines 11 – 35; column 17, lines 44 – 54 and the abstract in support of the 102(e) rejection of claim 1, claim 8 and claim 15. Utilizing these references, the Examiner characterizes Blumer as disclosing a computer program product for use in a computer system operatively coupled

to a computer readable memory, the computer program product including a computer-readable data storage medium tangibly embodying computer readable program code for directing said computer to create and manage links amongst units of information based on a list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information. The Examiner further characterizes Blumer as disclosing that the computer program product comprises code for instructing the computer system to store the list of identifiers and comprises code for instructing the computer system to examine the list of identifiers to determine the hierarchical order of the identifiers within the list of identifiers. Blumer is further characterized by the Examiner as a computer program product comprising code for instructing the computer system to link a unit of information to at least one other unit of information based on the relative hierarchical order of identifiers including an identifier identifying the unit of information and another identifier identifying the at least one other unit of information.

Applicant appreciates the excellent research conducted by the Examiner and has, accordingly, studied the Blumer reference very carefully. In view of this study, however, Applicant respectfully disagrees with the Examiner's interpretation of the above references and, accordingly, also respectfully disagrees with the Examiner's conclusions based thereupon. While the Blumer reference and Applicant's present disclosure certainly pertain to the same general technology area, it will become apparent to the Examiner upon reading the arguments set forth below that the Applicant's invention distinguishes over the Blumer reference and makes an unobvious contribution to the art in full view of the Blumer disclosure.

A key and fundamental distinction between the Blumer reference and Applicant's

invention is that Blumer describes a method for displaying a representation of a linked

document in the form of an outline view operatively connected to a link view. (see

Blumer abstract).

Therefore, a prerequisite for the teachings of the Blumer reference is a pre-

existing set of linked documents, referred to in Blumer as a "web of linked documents".

A "web of linked documents" is also referred in Blumer as simply a "web". (See Blumer

column 9, lines 36 – 38 which states "In accordance with the present invention, a method

is defined for representing relationships between linked elements on a web.").

In summary, then, Blumer is all about representing a pre-existing web of linked

documents in a manner that facilitates a user's understanding about preexisting inter-

document relationships. This is to be contrasted with Applicant's disclosure wherein a

convenient and efficient short hand method is disclosed for directing a link manager in

the creation of a web of linked documents. (See page 5, line 5 – 7 of Applicant's

specification which states "In a first aspect of the present invention, there is provided a

link management system for creating links amongst units of information based on a list of

identifiers arranged in an hierarchical order . . ."). In other words, the inventive aspects

of Applicant's invention are applicable to a process that is not even discussed within

Blumer other than to assume that the process exists. This assumption implies the process

of linking, in order to form the web, is complete; but, in contrast to applicant's disclosure,

does not teach how the linking was performed in order to form the web.

In order to clearly communicate this important distinction, Applicant has

amended Claim 1, Claim 8 and Claim 15 to clarify that the stored list of identifiers are in

fact those determined for directing the linking of information by a link management system so as to create a web of linked documents. Further, the title of the specification was also amended to additionally reflect this fundamental distinction.

Applicant's disclosure reveals a novel and unobvious invention for creating a web of linked units of information wherein a simple hierarchical list of identifiers can be provided to direct a link management system in the web creation in order that the linking conform to the intentions of a user. The preferred embodiment reveals the novel way in which the simple hierarchical list can transform units of information into a web of information with complex linking patterns. It is not intuitively obvious that such a simple list can easily and efficiently generate complex linking structures. Once this process, as taught in Applicant's disclosure, is entirely completed, only then can the Blumer reference be utilized to display the resulting web.

In view of the above, it is apparent that Blumer does not teach or suggest Applicant's claimed invention since Blumer simply assumes that the process related to Applicant's invention has successfully completed as a prerequisite to the further disclosed teachings of Blumer.

Since Blumer fails to anticipate claims 1, 8 or 15, Applicant submits that these claims are in immediate condition for allowance and respectfully request the Examiner to withdraw the 35 U.S.C 102(e) rejection of these claims.

Claims 2–7, 9–14, and 16-21

Claims 2-7, 9-14, and 16-21 depend directly or indirectly from the amended independent claims. Accordingly, Applicant respectfully submits that these dependent
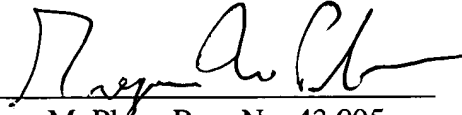
claims assume the patentable subject matter from their respective independent claims

from which they depend and are therefore also in immediate condition for allowance.

In consideration of the foregoing, Applicant respectfully requests that the

Examiner reconsider and withdraw the 35 U.S.C. 102(e) rejection for claims 2-7, 9-14,

and 16-21.

Conclusion

Applicant therefore respectfully requests that the Examiner reconsider all currently outstanding objections and rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. A prompt and favorable consideration of this Response is respectfully solicited. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is invited to telephone the undersigned at the number provided.

Respectfully submitted,

By: _____
Gregory M. Plow, Reg. No. 43,005
Agent for Applicant
IBM Corporation
Intellectual Property Law
555 Bailey Avenue, J46/G460
San Jose, CA 95141-9989
Telephone: (408) 463-2113

Date: July 29, 2003